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7 *Attorneys for Plaintiff The Hackett Miller Company, Inc.*

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 THE HACKETT MILLER COMPANY, INC., a
Nevada corporation,

13 Plaintiff,

14 v.

15 GFOUR PRODUCTIONS, LLC, a Florida limited
liability company; and SPOTLIGHT RIGHTS,
16 LLC, a Florida limited liability company,

17 Defendants.

18 Case No.: 2:16-cv-00418-RFB-NJK

19 **STIPULATION AND (PROPOSED)
ORDER FOR EXTENSION OF TIME
FOR PLAINTIFF TO FILE AN
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS FOR:
(1) LACK OF PERSONAL
JURISDICTION, (2) FAILURE TO
JOIN A NECESSARY PARTY,
(3) IMPROPER VENUE, AND
(4) REQUEST TO TRANSFER VENUE
(Second Request)**

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21 Plaintiff THE HACKETT MILLER COMPANY, INC. and Defendants GFOUR
22 PRODUCTIONS, LLC and SPOTLIGHT RIGHTS LLC, by and through their undersigned
23 counsel, hereby stipulate and agree to an 15-day extension of time up to and including September
24 30, 2016, for Plaintiff to file an Opposition to Defendants' Motion to Dismiss for: (1) Lack of
25 Personal Jurisdiction, (2) Failure to Join a Necessary Party, (3) Improper Venue, and (4) Request
26 to Transfer Venue in the above-captioned matter (ECF No. 22) ("Motion to Dismiss").

27 Defendant's Motion to Dismiss was filed on August 29, 2016. On September 13, 2016,
28 the parties filed a Stipulation giving Plaintiff a 15-day extension of time to file an Opposition to

1 Defendants' Motion to Dismiss (ECF No. 23) (the "First Extension Request") which extended the
 2 original deadline for Plaintiff's Opposition to Defendants' Motion to Dismiss to September 30,
 3 2016. The Court has not yet signed the First Extension Request.

4 By and through this Stipulation, the parties agree to extend the deadline for Plaintiff to file
 5 Plaintiff's Opposition to Defendants' Motion to Dismiss to October 17, 2016. This is Plaintiff's
 6 second request for an extension of time for Plaintiff to file an Opposition to Defendants' Motion
 7 to Dismiss. Plaintiff requests an extension of time to file an Opposition to Defendants' Motion
 8 to Dismiss in order to avoid unfairly prejudicing Plaintiff in this matter. Plaintiff's counsel is
 9 presently scheduled to appear for a jury trial commencing October 3rd and continuing through
 10 October 7, 2016. Given the necessity of devoting full attention to the trial and final preparations
 11 for the same, absent the brief extension requested, Plaintiff's counsel will be unable to
 12 competently and fully address the complex jurisdictional and venue issues raised in Defendants'
 13 Motion to Dismiss, thus unfairly prejudicing Plaintiff in this matter. Defendants, through this
 14 stipulation, have agreed to Plaintiff's requested extension under the circumstances.

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1 For these reasons, this Request is made for good cause and not for purposes of delay.

2 Dated: September 28, 2016

3 Respectfully Submitted,

5 /s/ Ryan Gile

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15 *Attorneys for Plaintiff, The Hackett
16 Miller Company, Inc.*

Dated: September 28, 2016

Respectfully Submitted,

5 /s/ Jonathan Winter

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24 *Attorneys for Defendants, GFour Productions,
25 LLC and Spotlight Rights, LLC*

18 **IT IS SO ORDERED.**



20 RICHARD F. BOULWARE, II
21 United States District Judge

22 DK #23 - MOOT.

23 DATED this 10th day of October, 2016.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Weide & Miller, Ltd. and that on September 28, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document will be served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ James L. Morris
An employee of WEIDE & MILLER, LTD.